

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:

1960 FAMILY PRACTICE, PA

Debtor

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**Case No: 20-35493**

## Chapter 7

## **CREDITOR'S WITNESS/EXHIBIT LIST**

[Ref. Doc. No. 106]

**FACT WITNESSES:**

1. Yoni Gerber
2. Ravishankar Mallapuram
3. Dr. Le
4. WPMC Representative – Jose Bello
5. Eva Englehart
6. Miriam Goott
7. Johnie Patterson
8. Michelle Friery
9. Mahvish Khan
10. Kimm Woods
11. Elana Bakina
12. Bernard Monderer
13. Any Witness Called by Any Other Party



Judge: Rodriguez

Hearing Date: January 13, 2023 at 3:00 p.m.

Party Name: WFCM 2016-C34 Northwest

## Freeway

Attorney's Name: Benjamin Lusky

Attorney's Phone: 713-589-4822

Nature of Proceeding: Objection to Claim  
No. 41 [Doc. No. 106]

Creditor reserves right to call additional witnesses.

## EXHIBITS

| Ex. # | Description                     | Offered | Objection | Admitted | Disposition |
|-------|---------------------------------|---------|-----------|----------|-------------|
| 1     | Debtor's bank statements 7-2019 |         |           |          |             |
| 2     | Debtor's bank statements 8-2019 |         |           |          |             |
| 3     | Business Records Affidavit      |         |           |          |             |
| 4     | Asset Purchase Agreement        |         |           |          |             |

|    |                                                                                      |  |  |  |  |
|----|--------------------------------------------------------------------------------------|--|--|--|--|
| 5  | Payment of \$500k per APA                                                            |  |  |  |  |
| 6  | Notice of Foreclosure                                                                |  |  |  |  |
| 7  | Substitute Trustee's Deed to WFCM (6-1-2021)                                         |  |  |  |  |
| 8  | Debtor's Schedules                                                                   |  |  |  |  |
| 9  | Demonstrative Exhibit based on Debtor's Schedules                                    |  |  |  |  |
| 10 | WFMC – POC                                                                           |  |  |  |  |
| 11 | Sale Order                                                                           |  |  |  |  |
| 12 | Complaint Filed by Trustee Against UMMC                                              |  |  |  |  |
| 13 | Answer filed by UMMC                                                                 |  |  |  |  |
| 14 | Claim Objection filed by UMMC 11-16-2022                                             |  |  |  |  |
| 15 | Trustee's Response to Claim Objection                                                |  |  |  |  |
| 16 | WMFC's Response to Claim Objection                                                   |  |  |  |  |
| 17 | UMMC Responses to Interrogatories – State Court                                      |  |  |  |  |
| 18 | UMMC Responses to RFA – State Court                                                  |  |  |  |  |
| 19 | Debtor's Responses to RFA from Landlord in State Court Litigation (Signed by Dr. Le) |  |  |  |  |
| 20 | RFA from WFCM – Exhibit A                                                            |  |  |  |  |
| 21 | RFA from WFCM – Exhibit B                                                            |  |  |  |  |
| 22 | RFA From WFCM – Exhibit E                                                            |  |  |  |  |
| 23 | RFA From WFCM – Exhibit F                                                            |  |  |  |  |
| 24 | UMMC Responses to Discovery from Trustee (RFA)                                       |  |  |  |  |
| 25 | UMMC Responses to Discovery from Trustee (Interrogatories)                           |  |  |  |  |
| 26 | 11-2019 and 12-2019 Invoice Suite 500                                                |  |  |  |  |
| 27 | 11-2019 and 12-2019 Invoice Suite 900                                                |  |  |  |  |

|    |                                                                       |  |  |  |  |
|----|-----------------------------------------------------------------------|--|--|--|--|
| 28 | General Ledger from Landlord                                          |  |  |  |  |
| 29 | Lease Ledger from Landlord                                            |  |  |  |  |
| 30 | Expense General Ledger                                                |  |  |  |  |
| 31 | Gerber Law Firm Invoices                                              |  |  |  |  |
| 32 | Communication with brokers                                            |  |  |  |  |
| 33 | Covid Orders                                                          |  |  |  |  |
| 34 | Houston Chronicle Articles (10-2-2020)                                |  |  |  |  |
| 35 | Houston Chronicle Articles (6-2021)                                   |  |  |  |  |
| 36 | Email from Debtor 12-3-2019                                           |  |  |  |  |
| 37 | Deposition transcript of Ravi Mallapuram and Exhibits from deposition |  |  |  |  |
| 38 | Dr. Le Deposition transcript 7-8-2022                                 |  |  |  |  |
| 39 | Dr. Le Deposition transcript 6-7-2022                                 |  |  |  |  |
| 40 | Dr. Le Deposition transcript 5-19-2022                                |  |  |  |  |
|    |                                                                       |  |  |  |  |
|    |                                                                       |  |  |  |  |
|    |                                                                       |  |  |  |  |
|    | <b>Rebuttal/Impeachment Exhibits</b>                                  |  |  |  |  |
| 1  |                                                                       |  |  |  |  |
| 2  |                                                                       |  |  |  |  |
| 3  |                                                                       |  |  |  |  |